

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

LA UNION DEL PUEBLO ENTERO, et al.,

Plaintiffs,

vs.

NO. 5:21-cv-844-XR

GREGORY W. ABBOTT, et al.,

Defendants.

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OCA-GREATER HOUSTON, et al.,

Plaintiffs,

vs.

NO. 1:21-cv-780-XR

JOHN SCOTT, et al.,

Defendants.

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HOUSTON JUSTICE, et al.

Plaintiffs,

vs.

NO. 5:21-cv-848-XR

GREGORY WAYNE ABBOTT, et al.

Defendants.

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LULAC TEXAS, et al.

Plaintiffs,

vs.

NO. 1:21-cv-786-XR

JOHN SCOTT, et al.

Defendants.

MI FAMILIA VOTA, et al.

Plaintiffs,

vs.

GREG ABBOTT, et al.

Defendants.

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UNITED STATES OF AMERICA,

Plaintiff,

vs.

NO. 5:21-cv-0920-XR

THE STATE OF TEXAS, et al.

Defendants.

NO. 5:21-cv-1085-XR

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**MI FAMILIA VOTA PLAINTIFFS' EXPERT DESIGNATIONS**

Plaintiffs Mi Familia Vota, Marla Lopez, Marlon Lopez, and Paul Rutledge (collectively, "Plaintiffs") by and through undersigned counsel, hereby submit their Initial Expert Designation Pursuant to Federal Rule of Civil Procedure 26(a)(2) and the Court's Scheduling Order (Dkt. 125), as amended by the Stipulated Extension of Expert Discovery Deadline (Dkt. 209).

Plaintiffs designate the following expert witnesses:

**Eric McDaniel, Ph.D.**

Department of Government  
1 University Station A1800  
Austin, TX 78712

**Christian R. Grose, Ph.D.**

497 W. Avenue 44  
Los Angeles, CA 90065

**Franita Tolson, J.D.**

Vice Dean for Faculty and Academic Affairs

Professor of Law

Professor of Political Science and International Relations (Courtesy)

USC Gould School of Law

699 W. Exposition Blvd.

Los Angeles, CA 90089

Dr. McDaniel, Dr. Grose, and Professor Tolson will testify regarding the matters and opinions contained in their expert reports, including amendments and supplements, if any. Dr. McDaniel, Dr. Grose, and Professor Tolson were retained by Plaintiffs to provide expert testimony and may be contacted through undersigned counsel. Copies of their reports were sent to all counsel on February 28, 2022.

Discovery is ongoing in this matter and Plaintiffs reserve the right to designate additional expert witnesses for the purpose of addressing, responding to, and/or rebutting Defendants' claims, and/or to address information obtained during discovery.

Further, Plaintiffs reserve the right to supplement and/or amend these designations in compliance with the Federal Rules of Civil Procedure, Court Order, and/or agreement between the parties.

Plaintiffs reserve the right to designate additional experts as allowed by Court Order, the Federal Rules of Civil Procedure, and/or any agreement between the parties. Plaintiffs reserve the right to de-designate any experts and/or to classify them as consulting experts in accordance with the Federal Rules of Civil Procedure and governing case law.

DATED: March 1, 2022

Respectfully submitted,

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## CERTIFICATE OF SERVICE

I certify that on March 1, 2022 a true and correct copy of the foregoing document was served in compliance with the Federal Rules of Civil Procedure upon the following via electronic mail:

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